

1
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3 **THE WESBROOKS LAW FIRM, P.L.L.C.**
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5 **Peoria, Arizona 85381**
6 **(602) 262-0390 Fax: (888) 477-5598**
7 wesbrooksefax@gmail.com
8 **State Bar No. 018690**
9 **Attorney for Debtors**

10
11 **IN THE UNITED STATES BANKRUPTCY COURT FOR**
12 **THE DISTRICT OF ARIZONA**
13

14 **In Re:**

15 **CATHERINE ANNE WILLIAMSON,**

16 **Debtor.**

17 **In Re:**

18 **ROBERT LANCASTER**
19 **WILLIAMSON, III,**

20 **Debtor.**

21 **This pleading applies to the case or cases as**
22 **noted above.**

23 **CASE NO. 2:15-bk-15653**
24 **2:16-bk-00788**

25 **CHAPTER 13**

26 **MOTION TO PERMIT**
27 **WITHDRAWAL OF MARK**
28 **WESBROOKS AND THE**
WESBROOKS LAW FIRM, P.L.L.C.,
AS LEGAL COUNSEL FOR
DEBTORS
[E.R. 1.16(a) and (b)]
(Jointly Administered)

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NOW COMES, Mark Wesbrooks and The Wesbrooks Law Firm, P.L.L.C.

(“Attorneys”), and moves the Court to permit withdrawal of said Attorneys, from further

representation of the Debtors in the present case for the following good and sufficient

Motion to Withdraw as Counsel for Debtors - Page 1

1 cause:

2 The case is confirmed, with all matters required under the attorney/client fee
3 agreement accomplished. Services contemplated under the attorney client representation
4 agreement have been fully accomplished, with the Court having confirmed the Chapter 13
5 Plan. Furthermore, Counsel is requesting withdrawal under E.R. 1.16(a) as Counsel is
6 reducing his caseload as required for Counsel's existing practice, which requires
7 withdrawal in this confirmed Chapter 13 case.
8

9
10 There exists no further contested matter in the case. The Plan is confirmed with the
11 Client meeting Plan confirmation requirements. No pending unresolved matter exists, nor
12 is there any pending contested matter. All services the subject of Counsel's employment
13 have been successfully accomplished, with successful confirmation of the Debtors'
14 Chapter 13 case.
15

16
17 Counsel has conferred with the Debtors regarding the ongoing requirements of the
18 case, having advised in writing of the requirements through conclusion of the case.

19 There exists no further agreement for legal services by Movant or his Firm.

20
21 There are no pending hearings or trial settings. Counsel has conferred with Debtors
22 regarding the status of the case and provided written notice of withdrawal. Counsel has
23 complied with Local Rule 9010-1(b). In this regard, Debtors have been advised, in
24 writing, as to the status of the case, including the date and times of any court hearings or
25 trial settings and the need to comply with any existing court orders, and the possibility of
26 sanctions for the failure to comply.
27

28 Motion to Withdraw as Counsel for Debtors - Page 2

1 The Debtors' present address and contact information is reported as follows:

2 Catherine Williamson
3 2272 S. McClelland Pl.
4 Chandler, AZ. 85286
5 Phone: (602) 769-2120
6 cate@rwiii.com

7 Robert Williamson, III
8 2272 S. McClelland Pl.
9 Chandler, AZ. 85286
10 Phone: (214) 215-1416
11 robert@rwiii.com

12 Counsel has conferred with Debtors, advising in writing of case requirements
13 moving forward, including matters required under the Stipulated Order Confirming,
14 requirements of the Trustee's office, and applicable requirements under Local Rules.

15 WHEREFORE, premises considered, Attorneys for Debtors pray that the Court
16 permit withdrawal of Attorneys from further representation of the Debtors.

17 Respectfully submitted, on the 11th day of October 2023,

18 **THE WESBROOKS LAW FIRM, P.L.L.C.**
19 15396 N. 83rd Ave., Ste. C100
20 Peoria, Arizona 85381
21 (602) 262-0390
22 (888) 477-5598 FAX

23 By MW018690
24 Mark Wesbrooks
25 State bar No. 018690

26 ATTORNEYS FOR DEBTORS

1 Filed via ECF, this
2 11th day of October 2023, with
3 **COPY of the foregoing mailed
on same date to:**

4 Catherine Williamson
5 2272 S. McClelland Pl.
6 Chandler, AZ. 85286
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8 Robert Williamson, III
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12 **Notice will be electronically mailed to:**

13 ANTHONY W. AUSTIN on behalf of Creditor Victoria Gunvalson
14 aaustin@fennemorelaw.com, gkbacon@fclaw.com

15 RUSSELL BROWN
16 ecfmailclient@ch13bk.com

17 RUSSELL BROWN on behalf of Trustee RUSSELL BROWN
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19 DAVID WINTHROP COWLES on behalf of Creditor JPMORGAN CHASE BANK
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22 MARY K. FARRINGTON-LORCH on behalf of Creditor AMERICAN EXPRESS
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24 Rachel Elizabeth Flinn on behalf of Trustee RUSSELL BROWN
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26 LEONARD 3 MCDONALD, JR. on behalf of Creditor JPMORGAN CHASE BANK,
27 NATIONAL ASSOCIATION

28 Motion to Withdraw as Counsel for Debtors - Page 4

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4 LEONARD J. MCDONALD, JR. on behalf of Creditor Bank of America, National
5 Association, as Assignee to Banc of America Mortgage Capital Corporation
6 ecf@tblaw.com

7 LEONARD J. MCDONALD, JR. on behalf of Creditor Bank of America, National
8 Association, as Assignee to Banc of America Mortgage Capital Corporation
9 ecf@tblaw.com

10 LEONARD J. MCDONALD, JR. on behalf of Creditor Truist Bank
11 ecf@tblaw.com

12 ANNE ELIZABETH NELSON on behalf of Creditor UNITED STATES OF
13 AMERICA (IRS)
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15 NATHAN FREDERICK JONES SMITH on behalf of Creditor Bank of America,
16 National Association, as Assignee to Banc of America Mortgage Capital Corporation
17 nathan@mclaw.org, AZ_ECF@mclaw.org, cvalenzuela@mclaw.org

18 NATHAN FREDERICK JONES SMITH on behalf of Creditor Truist Bank, successor
19 by merger to SunTrust Bank
20 nathan@mclaw.org, AZ_ECF@mclaw.org, cvalenzuela@mclaw.org

21 U.S. TRUSTEE
22 USTPRegion14.PX.ECF@USDOJ.GOV

23 HELEN ELIZABETH WELLER on behalf of Creditor Dallas County
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27 MARK WESBROOKS on behalf of Debtor ROBERT LANCASTER WILLIAMSON,
28 III
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3 MARK WESBROOKS on behalf of Special Counsel MARK WESBROOKS
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